

## JOHN DEERE HARVESTER WORKS

1100 13TH AVENUE, EAST MOLINE, ILLINOIS 61244 U.S.A.



8 October 1985

CERTIFIED MAIL

Mr. Mark A. Haney, Manager  
Facilities Compliance Unit  
Compliance Monitoring Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Haney,

This letter is in response to your compliance inquiry letter, dated 24 September 1985.

The twelve drums of paint and solvent that did not have accumulation start dates marked on them were being stored for recycling. A past U.S. EPA ruling had stated that non-listed hazardous wastes being held for recycling were exempt from the 90-day storage rule. We were not aware that this rule had changed and, therefore, had not dated the material in question. Accumulation start dates will now be marked on each container of hazardous waste that is filled and stored for disposal, or reclaim. Storage time will also be limited to 90 days. The twelve drums in question, along with some additional material, were shipped on 9 October 1985.

Contingency plan arrangements with state and local emergency response teams were not completed due to an oversight. A separate arrangement was not made with hospitals since these arrangements were already in place as part of our regular factory operation. Primary and alternate emergency coordinators had not been named, as it was assumed that they would be contacted in the order listed. An evacuation plan was not prepared for hazardous waste, specifically, as it was determined to be unnecessary due to the quantity and nature of wastes being stored.

EPA Region 5 Records Ctr.



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Page 2.

Our contingency plan has been revised to include an existing factory evacuation plan and names a primary emergency coordinator and alternates in the order by which they will assume responsibility. These plan revisions have been sent to the police and fire departments previously contacted. The contingency plan has also been sent to the hospital providing emergency service to this facility and also to the Emergency Services and Disaster Agency.

Copies of our transmittal letters and revised contingency plan are enclosed. Also, enclosed is a copy of the manifest showing shipment of the drums of paint and solvent in question.

I believe all of the items in question are now in compliance.



Robert G. Dick  
Environmental Coordinator

jp  
enclosures

c: M. E. McGuire, Deere & Company

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Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. I.L.D.0.2.5.4.2.3.0.5.4 0.0.0.0.2		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address JOHN DEERE HARVESTER WORKS 1100 13th STREET, EAST MOLINE, IL 61244						A. State Manifest Document Number WI 23352									
						B. State Generator's ID 1 6 1 8 1 0 0 0 1 5									
4. Generator's Phone ( 309 ) 752-6272						C. State Transporter's ID 1 1 3 3									
5. Transporter 1 Company Name BARTON SOLVENTS						D. Transporter's Phone (319) 355-0203									
6. US EPA ID Number I.A.D.0.8.7.1.2.5.9.3.6						E. State Transporter's ID 1 1 3 3									
7. Transporter 2 Company Name BARTON SOLVENTS						F. Transporter's Phone (319) 355-0203									
8. US EPA ID Number I.A.D.0.8.7.1.2.5.9.3.6						G. State Facility's ID 9 5 5 0 3 5 0 0 0 1									
9. Designated Facility Name and Site Address WASTE RESEARCH & RECLAMATION CO. ROUTE 7 EAU CLAIRE, WI 54701						H. Facility's Phone (715) 834-9624									
10. US EPA ID Number W.I.D.9.9.0.8.2.9.4.7.5															
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.			
a. WASTE PAINT RELATED MATERIAL FLAMMABLE LIQUID NA 1263						23 . . . . . AM		1265		G		D001			
b. COMBUSTIBLE LIQUID N.O.S. MINERAL SPIRITS NA 1993						. . . . . DM		. . . . . 55		G		D001			
c. 1,1,1 TRICHLOROETHANE NA 2831						. . . . . DM		. . . . . 1.1.0		G		U226			
d. . . . .						. . . . .		. . . . .		. . . . .		. . . . .			
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
15. Special Handling Instructions and Additional Information															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources.															
Printed/Typed Name ROBERT G. DICK						Signature Robert G. Dick						Date Month Day Year 1.0 0.9 1985			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name David C. Becker						Signature David C. Becker		Date Month Day Year 1.0 0.9 1985	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name RECEIVED						Signature		Date Month Day Year . . . . .	
19. Discrepancy Indication Space						OCT 1 5 1985 IEPA-DLPC									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name						Signature						Date Month Day Year . . . . .			

Emergency 24 Hour Assistance Telephone Number  
In Wisconsin (608-266-3232)  
Outside Wisconsin (800-424-8802)

Distribution: 1 - BSWM 4 - Facility  
2 - Generator 5 - Generator  
3 - BSWM 6 - Transporter  
BSWM Copies 1 & 3 mail to above.

COPY 1

# JOHN DEERE HARVESTER WORKS

1100 13TH AVENUE, EAST MOLINE, ILLINOIS 61244 U.S.A.



4 October 1985

## CERTIFIED MAIL

Mr. John Plunk  
Emergency Services and Disaster Agency  
200 West Douglas  
Jacksonville, IL 62650

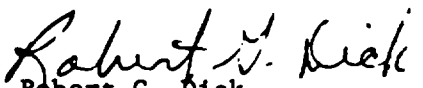
Dear Mr. Plunk,

As you are aware, Illinois and U.S. EPA Waste Disposal Regulations require that arrangements be made with local police and fire departments, hospitals and state and local emergency response teams for dealing with hazardous waste incidents. We have prepared a list of emergency procedures and emergency coordinator personnel in order that we might respond properly to a fire, or spill, involving hazardous wastes. These lists are attached.

Standard operating procedures are also in place to minimize the risk of a release of hazardous wastes. The John Deere Harvester Works generates very few hazardous wastes and stores these in small quantities in a designated area.

Should you wish to discuss our waste handling, or emergency procedures, please call me at (309)752-6272.

Sincerely,

  
Robert G. Dick  
Environmental Coordinator  
jp  
attachments

c: M. E. McGuire - Deere & Company  
M. E. Olson - Security

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